

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

| | |
|---|---|
| IN RE: ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION | Master File No. 2:12-MD-02327 MDL 2327 |
| THIS DOCUMENT RELATES TO ETHICON WAVE 1 CASES | JOSEPH R. GOODWIN U.S. DISTRICT JUDGE |

**CROSS NOTICE OF DEPOSITION OF BRUCE ROSENZWEIG, M.D.
ON SEPTEMBER 22, 2015 AT 10:00 A.M. CENTRAL STANDARD TIME**

TO: ALL COUNSEL OF RECORD

PLEASE TAKE NOTICE that the deposition of BRUCE ROSENZWEIG, M.D., will be taken jointly in connection with *In Re: Ethicon, Inc., Pelvic Repair System Products Liability Litigation*, MDL No. 2327 (Wave 1 Cases), United States District Court, Southern District of West Virginia and *Mullins v. Ethicon, Inc., et al.*, Southern District of West Virginia, case No. 2:12-MD-02952, upon oral examination on September 22 at 10:00 a.m. CST, at the offices of Wexler Wallace, 55 West Monroe Street, Suite 3300, Chicago, IL 60603.

PLEASE TAKE FURTHER NOTICE that in accordance with Rule 30 of the Federal Rules of Civil Procedure, the procedures set forth in *In Re: Ethicon Inc., Pelvic Repair System Products Liability Litigation*, MDL No. 2327, Plaintiffs hereby cross-notice this deposition for any and all purposes permitted by the Federal Rules of Civil Procedure, the rules of the MDL Court, and any other state or local rules that apply to this action. Plaintiffs further state that this deposition shall be conducted in accordance with and subject to the Protective Orders entered in *In Re: Ethicon Inc., Pelvic Repair System Products Liability Litigation*, MDL No. 2327.

This deposition will be taken before a person authorized by law to administer oaths and be recorded by stenograph.

Dated: September 15, 2015

PLAINTIFFS' CO-LEAD COUNSEL

By: _____/s/Thomas P. Cartmell_____

THOMAS P. CARTMELL
Wagstaff & Cartmell LLP
4740 Grand Avenue, Suite 300
Kansas City, MO 64112
816-701-1100
Fax 816-531-2372
tcartmell@wcllp.com

D. RENEE BAGGETT
Aylstock, Witkin, Kreis and Overholtz, PLC
17 E. Main Street, Suite 200
Pensacola, FL 32563
850-202-1010
850-916-7449
Rbaggett@awkolaw.com
Plaintiffs' Co-Lead Counsel

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

| | |
|---|---|
| IN RE: ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION | Master File No. 2:12-MD-02327 MDL 2327 |
| THIS DOCUMENT RELATES TO ETHICON WAVE 1 CASES | JOSEPH R. GOODWIN U.S. DISTRICT JUDGE |

CERTIFICATE OF SERVICE

I hereby certify that on September 15, 2015, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

PLAINTIFFS' CO-LEAD COUNSEL

By: _____/s/Thomas P. Cartmell
THOMAS P. CARTMELL
Wagstaff & Cartmell LLP
4740 Grand Avenue, Suite 300
Kansas City, MO 64112
816-701-1100
Fax 816-531-2372
tcartmell@wcllp.com